

1 **DICKINSON WRIGHT PLLC**
2 JOHN L. KRIEGER
3 Nevada Bar No. 6023
4 Email: jkrieger@dickinson-wright.com
5 STEVEN A. CALOIARO
6 Nevada Bar No. 12344
7 Email: scaloiaro@dickinson-wright.com
8 8363 West Sunset Road, Suite 200
9 Las Vegas, Nevada 89113-2210
10 Tel: (702) 550-4400
11 Fax: (844) 670-6009
12 *Attorneys for Plaintiff*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 GLEN J. LERNER, an individual,

16 Plaintiff,

17 vs.

18 EXECUTIVE MARKETING
19 CONSULTANTS, INC., a California
20 corporation, ELLIS LAW CORPORATION,
21 a California corporation; DOES 1-50,
22 INCLUSIVE; and ROE CORPORATIONS
23 51-100,

24 Defendants.

25 CASE NO.: 2:18-cv-01481-JAD-CWH

26 **STIPULATION AND ORDER TO
27 EXTEND BRIEFING SCHEDULE RE
DEFENDANTS' MOTION TO DISMISS
(ECF NO. 6)**

28 **(First Request)**

29 Plaintiff GLEN J. LERNER ("Lerner"), Defendants EXECUTIVE MARKETING
30 CONSULTANTS, INC., and ELLIS LAW CORPORATION ("EMC/ELC") through their
31 undersigned counsel, hereby respectfully jointly submit this Stipulation and Order to Extend
32 Briefing Schedule Re Defendants' Motion to Dismiss (ECF No. 6). Lerner recently retained the
33 law firm of Dickinson Wright as counsel in this matter, and said counsel needs a brief extension
34 of time to become familiar with the case such that a response can be prepared. So as to
35 accommodate Lerner's new counsel and the intervening Thanksgiving holiday, the parties have
36 agreed to the following schedule:
37

1 1. Lerner's opposition to the motion to dismiss, if any, will be due on or by **Wednesday, November 21, 2018**.

2 2. EMC/ELC's reply in support of their motion to dismiss, if any, will be due on or by **Tuesday, December 4, 2018**.

3 This is the first stipulation for extension of time regarding briefing on the Motion to
4 Dismiss to file, which is sought in good faith and not for the purpose of delay.

5 IT IS SO AGREED AND STIPULATED:

6 DATED this 5th day of November, 2018.

7 DICKINSON WRIGHT PLLC

8 HOWARD & HOWARD ATTORNEYS PLLC

9 By: /s/ John L. Krieger
10 John L. Krieger, Nevada Bar No. 6023
11 Steven A. Caloiaro, Nevada Bar No. 12344
12 8363 West Sunset Road, Suite 200
13 Las Vegas, Nevada 89113
14 Email: jkrieger@dickinson-wright.com
15 Email: scaloiaro@dickinson-wright.com

16 By: /s/ Jonathan W. Fountain
17 W. West Allen, NV Bar No. 5566
18 Jonathan W. Fountain, NV Bar No. 10351
19 3800 Howard Hughes Pkwy., Suite 1000
20 Las Vegas, NV 89169
21 Email: wwa@h2law.com
22 Email: jwf@h2law.com

23 *Attorneys for Plaintiff Glen J. Lerner*

24 John D. Denkenberger (*Pro Hac Vice*)
25 CHRISTENSEN O'CONNOR JOHNSON
26 KINDNESS PLLC
27 1201 Third Avenue, Suite 3600
28 Seattle, WA 98101

29 *Attorneys for Defendants Executive Marketing
30 Consultants, Inc. and Ellis Law Corporation*

31 IT IS SO ORDERED:

32 
33 UNITED STATES DISTRICT JUDGE

34 Dated: November 6, 2018.